UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In Re:	BCN#: 22-30635-KRH
Phillip John Snyder and Laurie Lynne Snyder	Chapter: 13
Debtors	

RESPONSE TO DEBTOR'S MOTION TO SELL REAL ESTATE

Comes now PHH Mortgage Corporation ("Creditor"), by Counsel, and for its response to the Debtor's Motion to Sell Real Estate states as follows:

1. That PHH Mortgage Corporation holds a first priority deed of trust against the real property located at real property located at 3145 Abruzzo Place, Glen Allen, VA 23059.

2. That Creditor has no objection to the proposed sale of the real property located at 3145 Abruzzo Place, Glen Allen, VA 23059, which is secured by a first priority deed of trust against the subject property held by PHH Mortgage Corporation, provided that proceeds remain from the sale of the subject property to pay off its secured claim, as evidenced by the underlying note and deed of trust attached to its Amended Proof of Claim, in full, at settlement.

3. That Creditor further requests that all proceeds from the sale of the subject property be used to pay PHH Mortgage Corporation's secured claim in full, including its outstanding fees and costs, then due and owing at the date of settlement, and that nothing contained herein shall prevent this secured Creditor from proceeding to foreclosure upon obtaining relief from the Automatic Stay.

4. That to the extent the remaining proceeds from the sale of the subject property would be insufficient to payoff the lien of its underlying note and deed of trust, in full, at settlement; however, then PHH Mortgage Corporation hereby objects to the Motion to Sell Real Estate. Creditor further requests that a deadline for the sale, closing and receipt of the payoff funds by Creditor should be set for a date within 90 days of entry of an Order granting the Debtors' Motion to Sell the subject property.

WHEREFORE, having fully responded to the Debtors' Motion to Sell Real Estate formerly filed herein, your Respondent, PHH Mortgage Corporation, a secured creditor of the Debtors, respectfully prays that no Order or Decree be entered in this matter to its prejudice, and for such other and further relief as the Court may deem meet.

Dated: _7/27/2023_____

LOGS LEGAL GROUP LLP

Attorneys for PHH Mortgage Corporation

By: _/s/ Bryce Robertson_____
William M. Savage, Esquire
VSB #26155
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Randa Azzam, Esquire
VSB #31539
Counsel for Movant

CERTIFICATE OF SERVICE

I hereby certify that on the __27th_____ day of __July_____, _2023_____ the following person(s) were served a copy of the foregoing in the manner described below:

Via CM/ECF Electronic Notice:

James E. Kane, Kane & Papa, PC — Debtor's Attorney
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

Suzanne E. Wade — Chapter 13 Trustee
7202 Glen Forest Drive
Suite 202
Richmond, VA 23226

Via First Class Mail, Postage Prepaid:

Phillip John Snyder — Debtor(s)
3145 Abruzzo Place
Glen Allen, VA 23059

Laurie Lynne Snyder
3145 Abruzzo Place
Glen Allen, VA 23059

__/s/ Bryce Robertson_____
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Gregory N. Britto, Esquire
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